

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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TERRANCE PRUDE,

Plaintiff,

v.

Case No. 10-CV-167-JPS

DAVID A. CLARKE, JR., DENNIS  
MCKNIGHT, BRET MYERS, MATTHEW  
LEETE, AND MELVIN FINKLEY,

Defendants.

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**PLAINTIFF'S REVISED PROPOSED VERDICT FORM**

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Plaintiff Terrance Prude, by his undersigned counsel, hereby submit the following proposed verdict form to be administered at the close of trial.

**Question No. 1:** Did any or all of the following officers subject Plaintiff to unconstitutional conditions of confinement?

Officer McKnight \_\_\_\_\_ (Yes or No)

Officer Myers \_\_\_\_\_ (Yes or No)

Officer Leete \_\_\_\_\_ (Yes or No)

Officer Finkley \_\_\_\_\_ (Yes or No)

Sheriff Clarke \_\_\_\_\_ (Yes or No)

Regardless of how you answered Question No. 1, answer Question No. 2.

**Question No. 2:** Was there a legitimate penological purpose for the Sheriff's nutraloaf policy in Pod 4D of the Milwaukee County Jail that was in effect while the Plaintiff was housed there in September and October 2009?

Answer: \_\_\_\_\_ (Yes or No)

Regardless of how you answered Question No. 2, answer Question No. 3.

**Question No. 3:** What sum of money, if any, will fairly and reasonably compensate Plaintiff for any damages he sustained as a result of the actions of Defendants?

Answer: \$\_\_\_\_\_

Regardless of how you answered Question No. 3, answer Question No. 4.

**Question No. 4:** Did Plaintiff prove that punitive damages are warranted as a result of the actions of any or all of the following Defendants?

Officer McKnight \_\_\_\_\_(Yes or No)

Officer Myers \_\_\_\_\_(Yes or No)

Officer Leete \_\_\_\_\_(Yes or No)

Officer Finkley \_\_\_\_\_(Yes or No)

Sheriff Clarke \_\_\_\_\_(Yes or No)

If you answered “Yes” to Question No. 4 for any of the Defendants, answer Question No. 5 as to each Defendant for whom you answered “Yes” in response to Question No. 4; otherwise, stop.

**Question No. 5:** What amount of punitive damages is Plaintiff entitled to receive from one or more of the following Defendants?

Officer McKnight \$ \_\_\_\_\_

Officer Myers \$ \_\_\_\_\_

Officer Leete \$ \_\_\_\_\_

Officer Finkley \$ \_\_\_\_\_

Sheriff Clarke \$ \_\_\_\_\_

Dated this 9<sup>th</sup> day of January, 2013.

s/Pamela R. McGillivray

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Pamela R. McGillivray

Christa O. Westerberg

MCGILLIVRAY WESTERBERG & BENDER

211 South Paterson Street, Suite 320

Madison, WI 53703

mcgillivray@mwbatorneys.com

westerberg@mwbatorneys.com

(608) 310-3560 Phone

(608) 310-3561 Fax

Attorneys for Plaintiff